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The Administrative Record Staff

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EG&G ROCKY FLATS

92 RF 5411

EG&G ROCKY FLATS INC.

ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402-0464 (303) 966 7000

DIST	
AMIN A	
IAN H S	
CH D B	
CARNIVAL G J	
COPP R D	
DAVIS J G	
EVERED J E	X
FERRERA D W	
GOODWIN R	
HAMM B J	
HARMAN L K	
HEALY T J	
HILBIG J G	
DEKER E H	
KERSH J M	X
KIRBY W A	
KUESTER A W	
KRIEG D	
LEE E M	
MAE T C J R	
MARY G E	
MCDONALD M M	
MORGAN R V	X
POTTER G L	X
PIZZUTO V M	
SANDLIN N B	
WEDI R R	
SULLIVAN M T	
SWANSON E R	
TALMAN K G	
WIEDE J S	
WILKINSON R R	
WILSON J M	
ZANE J O	
Fuller, P I	X
N-ta, S M	X X
JE B K	X
Woods L	X
FLORY R C	X
HARRIS P D	
NCC Files	
E&W	X
CORRESP CONTROL	

May 15 1992

92 RF 5411

MAY 27 1992

erry A. Vaeth
anager
OE RFO

tn. J K Hartman

TE LADIES' TRESSES SURVEY REQUIREMENTS (5201) JEE-0370-92

response to your memo of May 7 1992 we have reviewed the "Interim Survey
requirements for *Spiranthes diluvialis*" as well as memoranda 92-RF-2629 and RF-92-4077
and have the following responses

General EG&G while recognizing that these are draft requirements that may be
subject to modification will comply with them to the fullest extent possible during
any future *Spiranthes* survey work

Attachment 2, Part 2c To prevent unreasonable delays to IAG-driven remedial
actions or other plant site projects EG&G would like to see the requirements
(a) describe what constitutes due diligence and (b) place a limit on the number of
surveys that must be performed to establish beyond reasonable doubt the
absence of this species from a proposed project site

Attachment 2, Part 3 Existing S C S National Wetland Inventory or 7.5 U S G S quad
maps may be at too large a scale to allow for precision mapping of small discrete
Spiranthes occurrences For example existing RFP wetland vegetation maps are
drawn at a scale of 1 = 500 which is barely sufficient to resolve many of the small
jurisdictional wetland areas in the buffer zone

Cover Letter, page 2, 95 EG&G would like to note that the draft Habitat Mitigation Plan
for Operable Unit 1 recognizes the need to protect this species from Front Range
development impacts and contains provisions for creation of a *Spiranthes* refuge within
the buffer zone

92 RF 2629 The Operable Unit 4 IM/IRA project site does not have a seasonally high
water table which is the most consistent site feature for *Spiranthes* Although neither
the presence or absence of *Spiranthes* was ever demonstrated on the French Drain
site the draft Habitat Mitigation Plan for this project addresses through creation of an
onsite refuge the potential loss of this species or its habitat The SID project site may
contain this species but additional surveys (per the interim requirements) are planned
in this area for August 1992

CLASSIFICATION

UCNI	X
UNCLASSIFIED	X
CONFIDENTIAL	
CR	

AUTHORIZED CLASSIFIER
SIGNATURE

5/15/92 JML
DATE

IN REPLY TO RFP CC NO

2510-RF 92

ACTION ITEM STATUS

OF 4 CDS

PARIAL

PP

ORIG & TTMS

BRH b-b

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI	
BY	G T Os'dink 870
DATE	8-25-93

T A. Vaeth
May 15 1992
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92 RF-4077. EG&G will conduct August surveys (per the interim requirements) at the following locations proposed and alternate landfill site road crossings base of B-1 dam, surface water stations SW50 SW51 SW52 SW57 SW58 and SW65 and monitoring stations GS05 GS07 and GS10 For other sites referenced in this letter EG&G stands by the findings of the U S Fish and Wildlife specified expert, Dr Dave Bucker of no suitable *Spiranthes* habitat

If there are any questions or concerns please contact Steve Nesta on X8605 or Richard Flory on X8680


J E. Evered Director
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EG&G Rocky Flats Inc

BKH.bmb

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